

TO: Federal Communications Commission  
ECFS Section

FROM: John Marcel  
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SUBJECT: R&O 08-182A, RM-11312, August 8, 2008

DATE: August 31, 2008

Dear Sir/Madam,

I am writing for comment pertaining to Paragraph 57 of the above mentioned R&O. This involves reconsidering the cost associated with licensing a GMRS station.

The current cost for this license is \$85 total. I understand this total is made up of an application fee and regulatory fee. The paragraph also mentions the possibility that the fee structure may be contributing to the low rate of compliance. There are a few comments I'd like to make about these two points.

1) The proliferation of easily obtained and inexpensive FRS/GMRS radios has lead to increased use by users in general of GMRS frequencies. While most, if not all, retailers state a license is required to operate on the GMRS frequencies, the crime of opportunity prevails in some cases and users of these types of radios do not apply for that license. It seems that the vast majority of retailers of FRS/GMRS radios have stopped carrying FRS only radios in favor of the dual service units.

I don't want to lay any blame, nor stop these radios from being sold. However, a portion of this situation is the result of type acceptance. But this is only a portion of the overall issue.

A by-product of this is the direct violation of GMRS rules by businesses (not grand fathered) that now utilize these radios for business purposes. Where FRS allows authorization of any user (Family, Business, etc), GMRS rules prohibit businesses from using GMRS frequencies. But as many purchase FRS/GMRS radios and find the GMRS frequencies have better reach, they violate the law and operate illegally on the GMRS frequencies.

2) The cost of these licenses is exceptionally high for the gain by the average end-user. While repeaters and commercial grade systems and equipment may be used, the typical user will likely utilize the above mentioned retail radios. The typical FRS/GMRS radio has a maximum 5-Watts, which doesn't carry the capability compared to the price of the license. Beyond the "crime of opportunity", many will seek to obtain the license, only to be discouraged by the cost and decide the radios will work with or without a license. Further, the user will quickly understand that the legal use of the FRS frequencies at a lower wattage is trumped by the higher wattage, but illegally used GMRS frequencies.

By lowering the cost of these licenses, I believe more applicants will "Do the Right Thing" and obtain a license. This will translate to higher compliance.

3) Enforcement of GMRS rules by the FCC has been perceived as non-existent by many licensed GMRS users. This has lead to something I don't think the FCC and/or GMRS licensees ever anticipated. That is many legally licensed GMRS user are simply letting their licenses lapse. The idea that since so many people are illegally using GMRS frequencies, why would I, a legally paying GMRS user, bother to send money to an agency that isn't doing anything for that money. I will admit personally, I debated renewing my GMRS license for this reason. And I know people

who didn't renew. They still carry the ideals and spirit of GMRS, but they don't "Waste Their Money" on a license w/no value.

By reducing the cost of the license, I feel more of these users would maintain their licenses. They still may not be happy with the FCC enforcement practices; it'd be an easier pill to swallow.

I do want to say that I too would like to see more enforcement of non-licensed users of GMRS. But I also understand that certain areas of enforcement are more important than GMRS.

4) While it requires more knowledge through testing, the cost comparison by frequency between Amateur Radio and GMRS is staggering. For little to no cost (but requisite knowledge) an Amateur Operator has access to thousands of frequencies (even at the Tech Level). In comparison, GMRS allows a total of 15 frequencies (23 when used with repeaters). And these frequencies must be shared with or fall adjacent to Non-Licensed frequencies and users. All of this at a significantly higher cost. For the amount of money required to obtain a GMRS license, this is another incentive for potential applicants not to get the license and current licensees to drop their license

5) While not as big a factor, I feel that the FCC change in callsign structure from the 3-Letter/4-Number callsigns dedicated to GMRS (i.e. KAA9999) to the standard 4-Letter/3-Number callsigns (i.e. my current call WPXA902) has impacted people getting their licenses. Like Amateur Radio, GMRS presented itself as unique, with unique callsigns.

6) I do realize and agree that the FCC must process these applications and renewals. For that reason, I don't believe this should ever be a free.

With these factors stated, I would like to recommend the following for GMRS licensing:

- 1) Reduce the fee for a GMRS Applicant (first time licensee) to \$30.
- 2) Reduce the fee for a GMRS Renewal (existing licensee) to \$20.
- 3) Extend the licensing period from 5-Years to 10-Years.
- 4) Restore issuing of 3-Letter/4-Number Callsigns. To avoid potential confusion with existing users with this style of callsign, begin licensing at KBA1111.
- 5) Require increased sized statements on Retailer FRS/GMRS radios to display the requirement for a license on the GMRS frequencies.
- 6) Increase enforcement of non-licensed GMRS users, focusing on urban areas and illegal business use. Fines should be sizable enough to prevent illegal activity (and may make up revenue from reduced license fees).
- 6a) Develop assistance measures from GMRS licensees and organized groups such as the Lakes Area Group (LAG) in the Great Lakes/Midwest area of the U.S.